



variety of matters, primarily litigation, including complex commercial litigation and complex civil rights and constitutional litigation.

6. Since 2019, through my firm I have served on certain matters—including this one—as Special Counsel for the Thomas More Society, a not-for-profit, national public interest law firm dedicated to restoring respect in law for life, family, and religious liberty. The Thomas More Society provides pro bono legal representation to plaintiffs and defendants involved in complex civil rights and constitutional litigation nationwide.

7. The Thomas More Society and its attorneys have a substantial record of raising and diligently pursuing legal challenges to incursions on First Amendment and other civil rights.

8. For example, a team of Thomas More Society attorneys (including myself and Stephen Crampton and Michael McHale who are also attorneys of record in this case) recently obtained a victory on appeal, after rehearing by the Second Circuit panel. In a case involving the First Amendment rights of pro-life sidewalk counselors in the context of the federal Freedom of Access to Clinic Entrances Act (FACE) and a similar state law and city ordinance, the District Court for the Eastern District of New York denied the State of New York’s motion for preliminary injunction against our clients. The State appealed, and a panel of the Second Circuit Court of Appeals first reversed the denial of the preliminary injunction, but then granted our clients’ petition for rehearing and vacated its own reversal of, and affirmed, the District Court’s decision. *New York by James v. Griep*, 11 F.4th 174 (2d Cir. 2021).

9. Prior to joining the Thomas More Society in 2019, I practiced law at RUNNYMEDE law group (2016-2018), Clark & Sauer, LLC (2013-2015), Bryan Cave LLP (now known as Bryan Cave Leighton Paisner LLP) (2010-2013), and Husch Blackwell Sanders, LLP (now known as Husch Blackwell LLP) (2000-2010) and represented clients across the

nation. As an attorney at each of these firms, I represented clients—including Fortune 500 companies—primarily in complex commercial litigation, including in the fields of securities, telecommunications, and tax, among others.

10. I have represented clients in several class action cases, including in *Bachman v. A.G. Edwards, Inc.*, No. 22052-01266 (Circuit Court of the City of St. Louis, Missouri) (securities); *Merrick v. Stifel Fin. Corp.*, No. 4:08CV1167–HEA (E.D.Mo.) (securities); *City of University City v. Sprint-Nextel*, No. 01-CC-004454 (Circuit Court of the County of St. Louis, Missouri) (telecommunications and tax); and *City of O’Fallon v. CenturyLink, Inc.*, No. 12SL-CC01723 (Circuit Court of the County of St. Louis, Missouri) (telecommunications and tax). In *Bachman*, for example, I successfully argued before the Missouri Court of Appeals, Eastern District, in favor of affirming the trial court’s order approving settlement. *Bachman v. A.G. Edwards, Inc.*, 344 S.W.3d 260 (Mo. Ct. App. 2011).

11. The Thomas More Society is an entire law firm of specialists in the laws applicable in this case, including RFRA and the First Amendment. Our team has expended considerable effort already in connection with the preliminary injunction [Doc. 51] and formulating and presenting the legal issues before the Court in the First Amended Class Action Complaint. We are fully prepared to prosecute this matter on behalf of the Plaintiff and the proposed class.

12. I and co-counsel and other Thomas More Society attorneys have been contacted, both before and during the current action, by many putative class members with interests similar to Plaintiff’s.

13. I understand the nature and magnitude of the expenses involved in litigating class action lawsuits and, as attorneys associated with Thomas More Society, counsel have sufficient resources to vigorously prosecute this action.

Dated this 28th day of February 2022.

/s/ Adam Hochschild  
Adam Hochschild